

John H. Maddock III (VSB No. 41044)
Sarah B. Boehm (VSB No. 45201)
McGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
Telephone: (804) 775-1000

Counsel to Fifth Third Bank

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	
)	Chapter 11
PAPER SOURCE, INC., <i>et al.</i> , ¹)	
)	Case No. 21-30660 (KLP)
Debtors.)	(Jointly Administered)
)	

**MOTION TO SEAL CONFIDENTIAL DOCUMENT IN SUPPORT OF MOTION OF
FIFTH THIRD BANK FOR RELIEF FROM THE
AUTOMATIC STAY AND THE RIGHT TO SETOFF PURSUANT
TO SECTIONS 362 AND 553 OF THE BANKRUPTCY CODE**

Fifth Third Bank (“**Fifth Third**”), by and through undersigned counsel, hereby files this motion (this “**Motion**”) seeking the entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing Fifth Third to file under seal a certain confidential document (the “**Confidential Document**”). In support of the Motion, Fifth Third respectfully represent as follows:

JURISDICTION

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of these cases and this Motion to Expedite in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

¹ The “**Debtors**” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Pine Holdings, Inc. (4460) and Paper Source, Inc. (8035). The Debtors’ service address is 125 South Clark St., Chicago, IL 60603.

2. The statutory bases for the relief requested herein are section 107(b) of the Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), and Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”).

FACTUAL BACKGROUND

3. In addition to maintaining various bank accounts at Fifth Third, the Debtors entered into certain agreements with Fifth Third (collectively, the “**Fifth Third Agreements**”), including a certain Commercial Card Service Agreement (the “**Credit Agreement**”) dated July 1, 2019. Fifth Third and Paper Source, Inc. (“**Paper Source**,” together with Pine Holdings, Inc., the “**Debtors**”) executed the Credit Agreement. In accordance with the Credit Agreement, Fifth Third established the Line of Credit for approximately \$1.4 million. Pursuant to the Credit Agreement, Paper Source agreed to, among other things, limit the use of all corporate credit cards tied to the Line of Credit to business or commercial purposes on behalf of Paper Source and to timely review and reconcile all account activity and transactions. Payment of the full amount outstanding under the Line of Credit is due on or before the payment due date (with payments dates and outstanding amounts set forth on each account statement provided to Paper Source). The Credit Agreement provides, in part, that Paper Source shall be in default upon failure to make any payments on any obligations, as well as if Paper Source became insolvent or “subject to any voluntary . . . bankruptcy or insolvency proceeding.” *Id.*

4. The Debtors are entitled to a rebate relating to the Line of Credit for the year 2020 (“**2020 Rebate**”). The 2020 Rebate is \$157,900.00. *Id.* at ¶ 10.

PROCEDURAL BACKGROUND

5. On March 2, 2021 (the “**Petition Date**”), the Debtors commenced their cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Eastern District of Virginia (this “**Court**”).

6. The Debtors' chapter 11 cases (the "Chapter 11 Cases") are jointly administered and the Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

7. On March 26, 2021, Fifth Third filed the *Motion of Fifth Third Bank for Relief from the Automatic Stay and the Right to Setoff Pursuant to Sections 362 and 553 of the Bankruptcy Code* (the "**Stay and Setoff Motion**"). Doc. No. 233. Through the Stay and Setoff Motion, Fifth Third seeks: (1) relief from the automatic stay pursuant to terminate the Credit Agreement entered into prepetition by Fifth Third and Paper Source; and, (2) the ability to setoff a 2020 Rebate of \$157,900.00, to which the Debtors are entitled, against the \$981,100.45 prepetition debt owed to Fifth Third. *See id.*

8. In support of the Stay and Setoff Motion, Fifth Third filed the *Declaration of Edward Goller, Special Assets, Vice President of Fifth Third Bank in Support of Motion of Fifth Third Bank for Relief from the Automatic Stay and the Right to Setoff Pursuant to Sections 362 and 553 of the Bankruptcy Code* (the "**Goller Declaration**"). Doc. No. 233, Ex. B.

9. Now, Fifth Third seeks to file its *Supplement to the Declaration of Edward Goller, Special Assets, Vice President of Fifth Third Bank in Support of Motion of Fifth Third Bank for Relief from the Automatic Stay and the Right to Setoff Pursuant to Sections 362 and 553 of the Bankruptcy Code* (the "**Goller Supplement**"), which attaches the Confidential Document in further support of the Stay and Setoff Motion. A *Motion to Expedite Hearing on the Motion to Seal Confidential Document as an Exhibit to the Goller Supplement in Support of the Motion of Fifth Third Bank for Relief from the Automatic Stay and the Right to Setoff Pursuant to Sections 362 and 553 of the Bankruptcy Code* has been filed contemporaneously herewith.

RELIEF REQUESTED

10. By this Motion, Fifth Third requests entry of an order, pursuant to section 107(b) of the Bankruptcy Code, authorizing Fifth Third to file the Confidential Document as an exhibit to the Goller Supplement under seal.

BASIS FOR RELIEF

11. Section 107(b) of the Bankruptcy Code authorizes this Court to issue orders to protect entities from potential harm caused by the disclosure of confidential information. Specifically, section 107(b)(1) of the Bankruptcy Code provides, in pertinent part:

On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may –
(1) protect an entity with respect to a trade secret or confidential research, development, or commercial information

11 U.S.C. § 107(b)(1).

17. Moreover, Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) provides:

On motion or on its own initiative, with or without notice, the court may make any order which justice requires . . . to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information

Fed. R. Bankr. P. 9018.

18. In granting relief under section 107(b) of the Bankruptcy Code, “[t]he court determines whether the subject documents fall within the provisions of § 107(b) and the appropriate remedy if they do.” *In re Barney’s, Inc.*, 201 B.R. 703, 707 (Bankr. S.D.N.Y. 1996). If the documents in question fall within the parameters of section 107(b), “the court is *required* to protect a requesting interested party and has no discretion to deny the application.” *In re Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994) (emphasis in original); *see also In re Lomas Fin. Corp.*, No. 90 Civ. 7827 (LLS), 1991 WL 21231, at *2 (S.D.N.Y. Feb. 11, 1991) (noting the broad

scope of the term “commercial information”); *see also In re Orion Pictures Corp.*, 21 F.3d 24 (2d Cir. 1994) (holding neither 11 U.S.C. § 107(b) nor Bankruptcy Rule 9018, requires commercial information be the equivalent of a trade secret to receive protection).

19. Here, the Confidential Document includes a confidentiality clause that requires it to be kept confidential due to the sensitive nature of the commercial information contained therein. Accordingly, the Confidential Document falls within the parameters established through 11 U.S.C. § 107(b) and Bankruptcy Rule 9018 and must be sealed.

WAIVER OF MEMORANDUM OF LAW

20. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in the Motion and all applicable authority is set forth in the Motion, Fifth Third requests that the requirement that all motions be accompanied by a separate memorandum of law be waived.

NO PRIOR REQUEST

21. Fifth Third has not sought the relief herein through any prior motion filed or made in this or any other court.

CONCLUSION

WHEREFORE, Fifth Third respectfully request that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting Fifth Third such other relief as is just and proper.

Dated: April 8, 2021
Richmond, Virginia

Respectfully Submitted,

/s/ John H. Maddock III
John H. Maddock III (VSB No. 41044)
Sarah B. Boehm (VSB No. 45201)
McGuireWoods LLP
800 East Canal Street
Richmond, Virginia 23219
Telephone: (804) 775-1000
Email: jmaddock@mcguirewoods.com
sboehm@mcguirewoods.com

Counsel to Fifth Third Bank

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of April 2021, I caused a copy of the foregoing to be served through the Court's CM/ECF system on all parties receiving notices in these cases. I also caused a copy of the foregoing to be served by email on the Service List (Core Parties and 2002 List), in the form attached hereto as **Exhibit B**, to the extent an email address was provided by the party seeking notice. To the parties where only a mailing address was provided on the Service List, I caused the foregoing to be mailed by First Class U.S. Mail, postage prepaid.

/s/ John H. Maddock III

John H. Maddock III

EXHIBIT A

John H. Maddock III (VSB No. 41044)
Sarah B. Boehm (VSB No. 45201)
McGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
Telephone: (804) 775-1000

Counsel to Fifth Third Bank

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
PAPER SOURCE, INC., <i>et al.</i> , ¹)	Case No. 21-30660 (KLP)
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Debtors.)	(Jointly Administered)
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**ORDER GRANTING MOTION TO SEAL CONFIDENTIAL DOCUMENT IN SUPPORT
OF THE MOTION OF FIFTH THIRD BANK FOR RELIEF FROM THE AUTOMATIC
STAY AND THE RIGHT TO SETOFF PURSUANT
TO SECTIONS 362 AND 553 OF THE BANKRUPTCY CODE**

Upon the motion (the “**Motion**”) of Fifth Third Bank (the “**Fifth Third**”), for an order, pursuant to Bankruptcy Code section 107 and Bankruptcy Rule 9018, requesting that a certain confidential document (the “**Confidential Document**”), be filed under seal as an exhibit to the Goller Supplement; and the Court having reviewed the Motion and the Confidential Document; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

¹ The “**Debtors**” in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Pine Holdings, Inc. (4460) and Paper Source, Inc. (8035). The Debtors’ service address is 125 South Clark St., Chicago, IL 60603.

1. The Motion is GRANTED.
2. Fifth Third is authorized to file the Confidential Document under seal.
3. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: _____
Richmond, Virginia

HONORABLE KEITH L. PHILLIPS
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ John H. Maddock III
John H. Maddock III (VSB No. 41044)
Sarah B. Boehm (VSB No. 45201)
McGUIREWOODS LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
Telephone: (804) 775-1000

Counsel to Fifth Third Bank

CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)

Pursuant to Local Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by all necessary parties.

/s/ John H. Maddock III
John H. Maddock III

EXHIBIT B

NAME	ADDRESS1	ADDRESS2	ADDRESS3	ADDRESS4	ADDRESS5	CITY	STATE	ZIP	COUNTRY	EMAIL	FAX
ABERNETHY, KESSIE, BOYD & HILLET, P.C.	COUNCIL FOR: COLON COUNTRY TAX ASSOCIATION	ATTN: PAUL LUTZ, LARRY BOYD, EMILY HAHN	1700 RIVERSIDE BLVD., SUITE 300			MCKINNEY	TX	75069	USA	phlax@abernethylaw.com; bankuptax@abernethylaw.com; ehahn@abernethylaw.com	214-544-0400
BARTER, SONCELO, BARNMAN, CAWDELL & BERNOWITZ, PC	COUNCIL FOR: OLD TIRE RESOURCES LLC	ATTN: J. DAVID GOSW	951 S STREET, NW			WASHINGTON	DC	20001		dflax@bartersonline.com	202-220-2241
BARCLAY, DANIEL, LLP	COUNCIL FOR: AIR RETAIL LLC, WESTFIELD LLC	ATTN: MICHAEL BARNETT, LISA BARNETT	4000 WINDY ROAD, 7TH FLOOR			NEW HAVEN	CT	06611		nlbarclay@barclaydan.com; mbarclay@barclaydan.com	203-544-6274
BORGES & ASSOCIATES, LLC	COUNCIL FOR: NORMAN PUBLISHING CO., INC	ATTN: WANDA BORGES, SUZ CHEN	575 UNDERHILL BLVD, SUITE 118			STOUGHTON	MA	01520		nlborges@borgeslaw.com	
BURN & FORMAN LLP	COUNCIL FOR: BURN & FORMAN LLP	ATTN: JOE A. JOSEPH	430 NORTH 20TH STREET, SUITE 500			BIRMINGHAM	AL	35203		JJOSEPH@BURN.COM	
CLARK HILL P.C.	COUNCIL FOR: VORNI ASSOCIATES	ATTN: DAVID BLAU	351 S. OLD WOODWARD AVE, STE. 200			BIRMINGHAM	MA	48029		blau@clarkhill.com	248-988-2316
CROWDER, WARE & MARTIN, P.A.C.	COUNCIL FOR: VICTOR PARK MANAGEMENT, LLC	ATTN: DONALD SCHULTZ, CARLOS DAVENPORT	150 N. MAIN STREET, SUITE 2000			NORFOLK	VA	23510		dcschultz@crowlaw.com; cdavenport@vwm-law.com	757-523-7375
ECORT, ELEANOR CHEN & MELLITT LLC	COUNCIL FOR: AIR RETAIL LLC, WESTFIELD LLC	ATTN: CHRISTOPHER PERERA, ANDREW CLEARY	910 EAST STREET, SUITE 1300			RICHMOND	VA	23219		cperera@ecortlaw.com; acleary@ecortlaw.com	804-698-2700
FOLEY & LADD LLP	COUNCIL FOR: L&R ASSOCIATES	ATTN: ERIN KANDOLTSKY	3008 E STREET, N.W., SUITE 800							erikand@foley.com	
FROST BROWN TODD LLC	COUNCIL FOR: WASHINGTON FARM GROUP INC.	ATTN: RONALD GLOD, A WELB, ERIN WYBURN	KENDAL HADSDON		330 GREAT AMERICA TOWER	CINCINNATI	OH	45202		erikand@foley.com	513-651-0811
FURNBERG, WOLD, P. C.	COUNCIL FOR: WHEATFIELD PLAZA GROUP LLC	ATTN: BURTON WETTON	111 GREAT NECK ROAD, SUITE 600			GREAT NECK	NY	11021		twetton@furnberg.com	516-465-5064
GISSON, GUNN & CRUTCHER LLP	COUNCIL FOR: INVESTECOR INTERNATIONAL INC.	ATTN: MICHAEL ROSENTHAL	200 PARK AVENUE			NEW YORK	NY	10016-0193		Mrosenthal@gissongunn.com	212-311-0035
GISSON, GUNN & CRUTCHER LLP	COUNCIL FOR: INVESTECOR INTERNATIONAL INC.	ATTN: MATTHEW BOULGOS	3161 MICHELSON DRIVE			IRVINE	CA	92618-4142		Mboulgos@gissongunn.com	949-451-4400
GOLSTON & STORRE PC	COUNCIL FOR: CHS COMMERCIAL OWNER LLC	SOUTH OF MARKET LLC, 8F PRUCENTER ASSOCIATION LLC	EMBARCADERO CENTER, EASTCHESTER ASSOCIATED LP	ATTN: VERA KASS-GORDY		NEW YORK	NY	10023		glkass@golstonlaw.com	212-678-6311
GOLSTON & STORRE PC	COUNCIL FOR: CHS COMMERCIAL OWNER LLC	SOUTH OF MARKET LLC, 8F PRUCENTER ASSOCIATION LLC	EMBARCADERO CENTER, EASTCHESTER ASSOCIATED LP	ATTN: VANESSA MOSKOW		BOSTON	MA	02110		vanessa@golstonlaw.com	617-574-6112
GOLSTON & STORRE PC	COUNCIL FOR: CHS COMMERCIAL OWNER LLC	SOUTH OF MARKET LLC, 8F PRUCENTER ASSOCIATION LLC	EMBARCADERO CENTER, EASTCHESTER ASSOCIATED LP			LOS ANGELES	CA	90067		jlmoskow@golstonlaw.com	213-105-5087
GREENBERG GROSS FRIEDMAN & MACHTEIG LLP	COUNCIL FOR: BEVEL, INC.	ATTN: JEFFREY KREGER	1900 AVENUE OF THE STARS, STE. 1200			MCKINNEY	TX	75069		jeffrey@greenlaw.com	714-345-7000
GREENBERG THURMAN LLP	COUNCIL FOR: COUNCIL FOR ACADEMIA 85 SPRING STREET & ROP LANDMANHO PROPERTIES, LLC	ATTN: THOMAS J. MOORE, JR.	1750 TYNONG BOWLINGWOOD, SUITE 2000			MCLEAN	VA	22102		thomasm@greenlaw.com; tmoore@thurlaw.com	703-740-1301
HARRIS & HESSLER LLP	PROPOSED COUNCIL FOR THE COMMITTEE	ATTN: MARK HINDGUTZ, MARK POWER	488 MADISON AVENUE			NEW YORK	NY	10022		pharriss@harrisslaw.com; mhpower@harrisslaw.com	212-749-7000
HENCKEL, ALLEN & WISSELP LLP	COUNCIL FOR: ARIZONA STREET REAL ESTATE TRUST	ATTN: BRUNDA GORDON	36 ALABAMA STREET			BOSTON	MA	02109		brunda@henckelallen.com; alw@henckelallen.com	617-491-9020
HENSELBERG FISCHER, P.C.	PROPOSED COUNCIL FOR THE COMMITTEE	ATTN: MICHAEL ROSENTHAL, BRITTANY FABELLA	THE EDGEWORTH BUILDING		2100 EAST CAPP STREET	RICHMOND	VA	23219		brunton@henfischerlaw.com	804-644-0557
KAMR, ROBINSON, COLEMAN LEGAN & PC	COUNCIL FOR: 40 CLOS AMSTERDAM VINCAL LLC	ATTN: MICHAEL ROZDOL	503 WESTMINSTER ROAD, BURLINGHAM			HONOLULU	HI	71906		mrrozdol@kamr.com	714-425-7100
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	GROSSMAN, EAG AND MARX R. GROSSMAN, EAG	535 WEST MONROE STREET			CHICAGO	IL	60661-3903		MRGROSSMAN@KATZENLAW.COM; MARX.R.GROSSMAN@KATZENLAW.COM	312-403-2001
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	KATZEN MUEHLEN ROZMAN LLP	535 WEST MONROE STREET			CHICAGO	IL	60661-3903		MRGROSSMAN@KATZENLAW.COM; MARX.R.GROSSMAN@KATZENLAW.COM	312-403-2001
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 210			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 210			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 2			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 2			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 2			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 2			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
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KATZEN MUEHLEN ROZMAN LLP	COUNCIL FOR: VICTOR ADRIAN AGENT 21 AT 11 MARX R.	ATTN: DENNIS LEWANDOWSKI	100 W MAIN STREET, SUITE 2			NEW YORK	NY	10013		denislaw@katzen.com	888-360-9892
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